BNDDUTY, CLOSED

U.S. District Court Southern District of Florida (Miami) CRIMINAL DOCKET FOR CASE #: 1:23-mj-04508-JG All Defendants

Case title: USA v. Goel Date Filed: 12/28/2023

Date Terminated: 12/28/2023

Assigned to: Magistrate Judge Jonathan

Goodman

Defendant (1)

Shray Goel

92985–510 YOB 1988 ENGLISH

TERMINATED: 12/28/2023

Pending Counts Disposition

None

Highest Offense Level (Opening)

None

Terminated Counts Disposition

None

Highest Offense Level (Terminated)

None

<u>Complaints</u> <u>Disposition</u>

WARRANT/INDICTMENT/CDCA/WIRE

FRAUD

Plaintiff

USA represented by Noticing AUSA CR TP/SR

Email: <u>Usafls.transferprob@usdoj.gov</u>

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Designation: Retained

Date Filed	#	Docket Text
12/28/2023	1	Magistrate Judge Removal of Indictment from Central District of California Case number in the other District 2:23–cr–00623–WLH as to Shray Goel (1). (dgj) (Entered: 12/28/2023)
12/28/2023	2	Order to Unseal as to Shray Goel Signed by Magistrate Judge Jonathan Goodman on 12/28/2023. (dgj) (Entered: 12/28/2023)
12/28/2023	3	Minute Order for proceedings held before Magistrate Judge Jonathan Goodman: Initial Appearance in Rule 5(c)(3)/Rule 40 Proceedings as to Shray Goel held on 12/28/2023. Deft has private counsel in CD/CA. Bond recommendation/set: Shray Goel (1) STIP \$400K PSB CO–SIGNED. AFPD assisted w/bond paperwork. Date of Arrest or Surrender: 12/28/23. Deft waived removal and was ordered removed to CD/CA. (Digital 13:31:17/13:43:31)
		It is ORDERED AND ADJUDGED that pursuant to the Due Process Protections Act, the Court confirms the United States obligation to disclose to the defendant all exculpatory evidence— that is, evidence that favors the defendant or casts doubt on the United States case, as required by <i>Brady v. Maryland</i> , 373 U.S. 83 (1963) and its progeny, and ORDERS the United States to do so. The government has a duty to disclose any evidence that goes to negating the defendants guilt, the credibility of a witness, or that would reduce a potential sentence. The defendant is entitled to this information without a request. Failure to disclose exculpatory evidence in a timely manner may result in consequences, including, but not limited to, exclusion of evidence, adverse jury instructions, dismissal of charges, contempt proceedings, disciplinary action, or sanctions by the Court. Signed by Magistrate Judge Jonathan Goodman on 12/28/2023. (dgj) Modified on 12/28/2023 (dgj). (Entered: 12/28/2023)
12/28/2023	4	\$400K PSB Bond Entered as to Shray Goel Approved by Magistrate Judge Jonathan Goodman. <i>Please see bond image for conditions of release</i> . (dgj) (Additional attachment(s) added on 12/28/2023: # 1 Restricted Bond with 7th Page) (dgj). (Entered: 12/28/2023)
12/28/2023	<u>5</u>	WAIVER of Rule 5(c)(3)/Rule 40 Hearing by Shray Goel (dgj) (Entered: 12/28/2023)
12/28/2023	<u>6</u>	ORDER OF REMOVAL ISSUED to Central District of Califorinia as to Shray Goel. Closing Case for Defendant. Signed by Magistrate Judge Jonathan Goodman on 12/28/2023. See attached document for full details. (dgj) (Entered: 12/28/2023)

UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA

FILED BY	MPD.C.
Dec 28,	2023
ANGELA E. I CLERK U.S. D S. D. OF FLA.	HST. CT.

UNITED STATES O	F AMERICA,	CASE NUMBER: 23-4508-MJ-GOODMAN
	PLAINTIFF,	2:23-cr-00623-WLH
SHRAY GOEL,	V.	
	DEFENDANT(S)	WARRANT FOR ARREST

To: UNITED STATES MARSHAL AND ANY AUTHORIZED UNITED STATES OFFICER

YOU ARE HEREBY COMMANDED to arrest SHRAY GOEL and bring him forthwith to the nearest Magistrate Judge to answer an Indictment

charging him with Wire Fraud and Aggravated Identity Theft, in violation of Title 18, United States Code, Section(s) 1343 and 1028A.

Kiry K. Gray NAME OF ISSUING OFFICER Clerk of Court SIGNATURE OF DEPUTY CLERK	December 13, 2023, Los Angeles, Control Date and Location of Issuance Honorable Jacqueline Chooljian By: NAME OF JUDICIAL OFFICER	A
RET	RN	
THIS WARRANT WAS RECEIVED AND EXECUTED WITH THE ARRES	OF THE ABOVE-NAMED DEFENDANT AT (LOCATION)	
DATE RECEIVED	NAME OF ARRESTING OFFICER	
DATE OF ARREST	TITLE	

CR-12 (08/10) WARRANT FOR ARREST Page 1 of 3

ADDITIONAL DEFENDANT INFORMATION

UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,					CAS	E NUMBER:		
PLAINTIFF				,				
		V.						
SHRAY (GOEL,				WARRANT FOR ARREST			
		D	EFENDA	NT(S)				
RACE:	SEX:	HEIGHT:	WEIGHT:	HAIR: EYES:		EYES:	OTHER:	
DATE OF BIRTH:	<u> </u>	PLACE OF BIRTH	I:	SOCIAL S	ECURIT	TY NO.:	DRIVER'S LICENSE NO.	ISSUING STATE
1988								
ALIASES:		SCARS, TATTOOS OR OTHER DISTINGUISHING MARKS:						
AUTO YEAR:	AUTO MAKE:	AUTO MODEL:		AUTO CO	LOR:		AUTO LICENSE NO.:	ISSUING STATE
LAST KNOWN RE	ESIDENCE:			LAST KN	OWN E	MPLOYMENT:		I
FBI NUMBER:	FBI NUMBER:							
ADDITIONAL INFORMATION:								
INVESTIGATIVE AGENCY NAME:			INVESTIGATIVE AGENCY ADDRESS:					
FBI, FDIC-O	olG							
NOTES:								

CR-12 (08/10) WARRANT FOR ARREST Page 2 of 3

UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF A	AMERICA,	CASE NUMBER:
	PLAINTIFF,	
V.		
SHRAY GOEL,	DEFENDANT(S)	WARRANT FOR ARREST

1 2 3 MP FILED BY_ FILED CLERK, U.S. DISTRICT COURT D.C. 4 Dec 28, 2023 5 12/13/2023 ANGELA E. NOBLE CLERK U.S. DIST. CT. S. D. OF FLA. - MIAMI CENTRAL DISTRICT OF CALIFORNIA 6 jb BY: DEPUTY 23-4508-MJ-GOODMAN 7 8 UNITED STATES DISTRICT COURT 9 FOR THE CENTRAL DISTRICT OF CALIFORNIA January 2023 Grand Jury 10 11 UNITED STATES OF AMERICA, CR No. 2:23-cr-00623-WLH 12 Plaintiff, I N D I C T M E N T 13 [18 U.S.C. § 1343: Wire Fraud; V. 18 U.S.C. \S 1028A(a)(1): Aggravated Identity Theft; 18 14 SHRAY GOEL, U.S.C. \S 981(a)(1)(C) and 28 Defendant. U.S.C. § 2461(c): Criminal 15 Forfeiturel 16 17 The Grand Jury charges: 18 COUNTS ONE THROUGH THIRTEEN 19 [18 U.S.C. §§ 1343, 2] 20 INTRODUCTORY ALLEGATIONS 2.1 At times relevant to this Indictment: 22 Defendant SHRAY GOEL resided in the Central District 23 of California and Milwaukee, Wisconsin, among other places. 24 With others working with him and at his direction, 25 defendant GOEL owned and operated a short-term property rental 26 business under various names including Abbot Pacific LLC, marketing 27 properties for short-term rental on Airbnb, Inc. ("Airbnb"),

HomeAway, Inc. (dba HomeAway.com or Vrbo.com) ("Vrbo"), and other online property rental platforms.

2.1

- c. Defendant GOEL and others working with him and at his direction owned and leased properties throughout the United States for the rental business, including properties in Los Angeles, California; Malibu, California; Marina Del Rey, California; Denver, Colorado; Chicago, Illinois; Davenport, Florida; Bloomington, Indiana; Cleveland, Ohio; Austin, Texas; Dallas, Texas; Nashville, Tennessee; and Milwaukee, Wisconsin, among other places. By 2019, they were managing nearly 100 properties across the United States.
- d. Airbnb was an online platform and marketplace for short-term and long-term property rentals and experiences, facilitating connections between hosts and guests. With respect to short-term rentals:
- i. Airbnb's terms of service governed access to and use of the Airbnb platform. Among other terms, the terms of service included terms specific for hosts and terms applicable to all listings created through the Airbnb platform.
- ii. Airbnb's terms of service required users, both hosts and guests, to register an account (which required agreement to the terms of service) in order to use features of the platform including publishing or booking a listing; all users were required to provide accurate, current, and complete information during the registration process and to keep their information up to date at all times.
- iii. Airbnb's terms of service prohibited users from assigning or transferring their account to anyone else or disclosing account credentials to any third party. While the Airbnb platform

had features to allow individual hosts to add other users as cohosts, such that other users could take certain actions in relation to the listings, such as accepting booking requests, messaging guests, and updating listing fees and calendar availability, the host remained solely responsible and liable for any listings published on the platform for their account.

iv. Airbnb's terms of service prohibited users from using the platform to publish, submit, or transmit anything that was deceptive, fraudulent, false, or misleading (either directly or by omission or failure to update information).

v. Airbnb's terms of service required hosts to comply with all laws, rules, and regulations applicable to their listings including laws, rules, and regulations requiring hosts to obtain licenses, permits, or registrations from state or local authorities.

vi. Airbnb's terms of service required hosts to provide accurate information concerning properties being listed, including the description of the properties, their location, and their calendar availability, that is, the availability of the properties for rental on listed dates; hosts were required to keep listing information (including calendar availability) up to date at all times; multiple bookings of the same property for the same or overlapping dates ("double bookings") were not allowed.

vii. Under Airbnb's terms of service, once a guest requested to book a listing at a published price, the host could not ask the guest to pay a higher price, and once a host accepted a booking or a booking was pre-approved, the host had a legally binding

agreement with the guest to host the guest at the booked listing on the booked dates for the published price.

2.1

viii. Following a confirmed booking, Airbnb would send the guest a booking confirmation and collect payment for the reservation, which Airbnb would hold until 24 hours after the guest checked into the listing, at which time Airbnb would release the payment to the host.

ix. A confirmed booking granted the guest a limited license to enter, occupy, and use the booked listing for the duration of the booked reservation. Hosts were not permitted to cancel confirmed bookings except as authorized by Airbnb's policies (for example, legitimate concerns about a guest's behavior, as discussed further below, or extenuating circumstances, as defined in Airbnb's policies).

x. If a host cancelled outside of Airbnb's policies, Airbnb could publish an automated review on the listing showing the host cancellation and impose a cancellation fee on the host's account. Further, if a host canceled a confirmed booking, absent legitimate concerns about a guest's behavior, the guest would be entitled to a full refund.

xi. Hosts could establish house rules including limits on the number of guests and extra charges for additional guests, and a host could cancel a reservation if the host had legitimate concerns about a guest's behavior, including unauthorized parties, and in such a situation, a guest might not be entitled to a refund.

xii. Hosts could elect to have a strict cancellation policy apply to their listings such that, absent extenuating

circumstances or in some instances a limited window following advanced bookings, a guest would not receive a refund for canceling a confirmed reservation. A host could voluntarily agree to give a guest a refund if the guest cancelled a listing outside a host's cancellation policy, but the host was not obligated to do so.

xiii. Following a completed reservation, guests and hosts could rate each other and post reviews of their experience, and these ratings and reviews were visible to other users of the Airbnb platform.

xiv. Hosts that cancelled confirmed reservations could receive negative guest ratings and reviews, and hosts that continually cancelled confirmed reservations could also have their payouts cancelled and their listings suspended and ultimately removed from the platform.

B. THE SCHEME TO DEFRAUD

- 2. Beginning no later than in or about January 2018, and continuing until at least in or about November 2019, in Los Angeles County, within the Central District of California, and elsewhere, defendant GOEL, together with others known and unknown to the Grand Jury, knowingly and with intent to defraud, devised, participated in, and executed a scheme to defraud Airbnb, Vrbo, and other online property rental platforms (the "rental platforms"), and guests booking properties through the rental platforms, as to material matters, and to obtain money and property from such victims by means of materially false and fraudulent pretenses, representations, and promises and the concealment of material facts.
 - 3. The scheme operated in substance as follows:

- a. Defendant GOEL operated a double-booking-bait-and-switch scheme on the rental platforms, secretly double-booking properties and then inventing fake last-minute excuses for cancelling overbooked guests or tricking them into switching to inferior replacements.
- b. Defendant GOEL and others working with him and at his direction profited from the scheme by running a secret bidding war to rent properties to the highest bidder, by keeping all of their properties in any given area at maximum capacity, and by otherwise being able to choose among overbooked guests, and they often refused to agree to refunds for guests who were entitled to them.
- c. To carry out the scheme, defendant GOEL and others working with him and at his direction would post, and cause to be posted, listings of properties for short-term rental on the rental platforms, creating listings throughout the course of the scheme and using other listings they had created dating back to at least 2016.
- d. In posting listings, defendant GOEL and others working with him and at his direction used false and misleading representations concerning the identities of the hosts, the addresses of the properties, the availability of the properties for rental on listed dates, the reserved status of properties for guests with confirmed bookings, the condition of the properties, and the veracity and completeness of the reviews of the properties and hosts, among other false and misleading representations.
- e. Defendant GOEL and others working with him and at his direction would post multiple listings of the same property, listing the property at different prices for the same date to try to maximize the price they could charge for each property on a given date, and

- trying to maximize occupancy rates on a given date by using overbooked properties to fill open properties in the same area, including using multiple listings of frequently-booked properties as bait to trick guests into booking those properties, intending to switch overbooked guests to less frequently-booked properties in the same area.
- f. Defendant GOEL and others working with him and at his direction used fake host names and in certain instances other people's identities and identification documents (the "fake hosts" or "fake host accounts"), creating these fake host accounts throughout the course of the scheme and using other fake host accounts they had created dating back to at least 2015. They used the fake host accounts to conceal their own identities, to double-book properties, to hide negative reviews by de-listing and re-listing properties, to protect against properties being removed from the rental platforms (by having properties listed through multiple hosts), and to continue to list properties after they had been banned from Vrbo in 2015 because of repeated host cancellations and guest complaints.
- g. The fake host accounts included: "Alex & Brittany,"
 "Annie & Chase," "Becky & Andrew," "Jess & Tyler," "Kelsey & Jean,"
 "Kris & Becky," "Rachel & Pete," "Sarah & Jason," "Stephen F.," and
 "Ryan J.," among other names. Defendant GOEL and others working with
 him and at his direction would pretend to be the fake hosts in
 communications with guests and the rental platforms.
- h. In at least some instances, defendant GOEL and others working with him and at his direction listed or caused to be listed addresses that had no residential structure, were unaffiliated with the co-schemers, or did not exist at all (insofar as the addresses

- did not correspond to any address in the relevant county records system and could not be found through any widely used Global Position System (GPS) such as google.com) ("fake addresses"). The use of fake addresses helped the co-schemers create duplicate listings for a single property, evade local rules and regulations governing short-term rentals, and control who had access to properties.
- i. Defendant GOEL and others working with him and at his direction would post misleading positive reviews of their listings by booking a listing using a fake host account other than the one being used to list a property, and using the fake host account that booked the listing, they would post a misleading positive review, falsely indicating that the review was from an unaffiliated, third-party guest who had stayed at the property.
- j. In at least some instances, defendant GOEL and others working with him and at his direction did not update a property's calendar availability after the property had been booked, and they continued to advertise the booked property as being available for rental on the already-booked dates, both by listing the property through multiple listings on a single rental platform and by cross listing the property on different rental platforms. The duplicate listings allowed defendant GOEL and others working with him and at his direction to rent the same property to multiple guests for the same or overlapping dates i.e., to double book the property.
- k. Defendant GOEL and others working with him and at his direction concealed the double bookings and the double-booking practice of the business, hiding the fact that properties were double-booked and/or still being listed after being booked, knowing that prospective guests would not reserve properties and pay for

reservations if they knew that the properties had been or could be double-booked, and that the rental platforms might prohibit them from continuing to use the rental platforms if the double-bookings were discovered.

- l. After a listing had been booked, defendant GOEL and others working with him and at his direction chose which (if any) guest to host, often selecting the guest who had booked the property at the highest price or who otherwise had the most profitable reservation, and, for an overbooked guest or a guest they did not otherwise host or want to host, they would do one of the following:
- i. They provided the guest with a false excuse as to why a booked property was unavailable, and then: (1) cancelled the reservation, but resisted the assessment of any cancellation fees; (2) convinced the guest to move to an alternative property by falsely representing the alternative was comparable or an upgrade, and denied refunds if guests complained; or (3) lied to the rental platforms about the guest or the reservation to keep money from guests entitled to refunds.
- ii. They convinced the guest to cancel the reservation under false pretenses including promising the guest a full refund when, in at least some instances, they lied to the rental platforms about the guest or the reservation including lies about promised refunds.
- iii. They stopped responding to the guest prior to check in, and in at least some instances, they lied to the rental platforms about the guest or the reservation, including falsely telling the rental platforms the guest had stayed in the booked property.

- m. If guests complained about a property or posted a negative review, defendant GOEL and others working with him and at his direction sometimes posted and caused to be posted false negative reviews about the guests, and they would remove or de-activate the negatively reviewed listing and use other listings of the same property or re-list the property with a new listing profile or an entirely new host profile.
- n. Defendant GOEL would pressure, threaten, and insult Airbnb customer service representatives and demand to be transferred to another representative or a supervisor when representatives indicated they were going to give refunds over defendant GOEL's objections, which sometimes resulted in representatives denying refunds to which guests were entitled, or transferring defendant GOEL to a representative or supervisor who might deny the refund.
- o. The co-schemers used the lies and misrepresentations to obtain payments from guests who would not have otherwise booked a reservation for one of the co-schemers' properties. The lies and misrepresentations also helped the co-schemers keep money from guests entitled to refunds, to avoid cancellation fees and negative reviews, and to keep the scheme going in the various ways discussed above. The last-minute nature of the cancellations also caused guests and the rental platforms to suffer losses when guests were forced to find last-minute alternative accommodations.
- p. In furtherance of the scheme, defendant GOEL and his co-schemers used the following properties, among others, and the following fake property addresses, among others, involving reservations booked by the following guests, among others:

2.1

Real Property Address	Fake Property Address(es)	Guests
1193 Angelina Street, Austin, TX 78702		J.Cof., P.C., E.I., K.S.
1342 North Greenview Avenue, Chicago, IL 60642		T.C., S.W.
1612 West Beach Avenue, Chicago, IL 60622	1600 West Beach Avenue, Chicago, IL 60622	K.F., S.P.
1656 West Erie Street, Chicago, IL 60622	1650 West Erie Street, Chicago, IL 60622	C.A., J.Cou., H.H., J.K., C.N., M.S.
1701 4th Avenue North, Nashville, TN, 37208	1650 5th Avenue North, Nashville, TN, 37208	A.H., A.S., L.S., C.V.
18922 Pacific Coast Highway, Malibu, CA 90265	20220 Pacific Coast Highway, Malibu, CA 90265	M.B., R.B., S.B., T.G. J.H., E.N., P.L., C.S. A.W., K.W., P.Z.
20006 Pacific Coast Highway, Malibu, CA 90265	20000 Pacific Coast Highway, Malibu, CA 90265	J.B., L.D., M.K., S.M.
20466 Pacific Coast Highway, Malibu, CA 90265		M.B., M.F., L.M., J.S.
20648 Pacific Coast Highway, Malibu, CA 90265		C.B., G.J., B.L., E.N. J.T.
20650 Pacific Coast Highway, Malibu, CA 90265		B.B., J.Pat., J.Pon., R.H.p
209 Montreal Street, Los Angeles, CA 90293		A.M., B.P., S.R., R.C.
2737 North Kenmore Avenue, Chicago, IL 60614	2700 North Kenmore Avenue, Chicago, IL 60614	A.C., P.L.

Real Property Address	Fake Property Address(es)	Guests
2272 North Lincoln Avenue, Chicago, IL 60614	2270 North Lincoln Avenue, Chicago, IL 60614	J.Cas., M.D.
3522 Shoshone Street, Denver, CO 80211		S.A.
521 San Juan Avenue, Los Angeles, CA 90291		T.S., K.L.
615 Brooks Avenue, Los Angeles, CA 90291		T.G., J.Per.
6304 Vista Del Mar, Los Angeles, CA 90293		J.G., D.L., M.F.
915 26th Street, Denver, CO 80205	2500 Curtis Street, Denver, CO 80285	D.C., F., W.N., L.M.
842 North Wood Street, Chicago, IL 60622	825 North Wood Street, Chicago, IL 60622 850 North Wood Street, Chicago, IL 60622; 925 North Wood Street, Chicago, IL 60622; 942 North Wood Street, Chicago, IL 60622	A.C., M.D., M.G., D.W.

q. In 2018 and 2019, in the course of the scheme and in furtherance of it, defendant GOEL and others working with him booked more than 10,000 reservations through Airbnb, receiving more than \$7 million in payouts on those reservations; they booked additional and sometimes conflicting reservations through Vrbo and received more than \$1.5 million in additional payouts from those reservations.

C. USE OF INTERSTATE WIRES

4. On or about the dates set forth below, in Los Angeles
County, within the Central District of California, and elsewhere, for
the purpose of executing the above-described scheme to defraud,
defendant GOEL and his co-schemers, together with others known and
unknown to the Grand Jury, aiding and abetting each other,
transmitted and caused the transmission of the following items by
means of wire communication in interstate commerce:

COUNT	DATE	INTERSTATE WIRING
ONE	12/14/2018	Communication on the Airbnb platform from Airbnb to guest T.S.: "We received a message from Rachel & Pete that their guest refused to leave the property"
TWO	12/14/2018	Communication on the Airbnb platform from Airbnb to guest K.L.: "we do understand that there w[as] inconvenience on your part as well. However, since your reservation is not affected, then we can't proceed with any compensation"
THREE	02/15/2019	Communication on the Airbnb platform from Airbnb to guest M.B.: "I am sorry to hear that your host needs to cancel your stay"
FOUR	04/27/2019	Communication on the Airbnb platform from defendant GOEL and others working with him to guest J.Pat.: "** You are located at: 20650 Pacific Coast Highway Malibu, CA 90265 **Check in 4pm **Check out 10am"
FIVE	06/20/2019	Communication on the Airbnb platform from defendant GOEL and others working with him to guest T.G.: "Our Address: **18922 Pacific Coast Highway, Malibu, CA, 90265** ** Check in 4pm ** "
SIX	07/01/2019	Communication on the Airbnb platform from defendant GOEL and others working with him to guest M.F.: "You are located at: ** 6304 Vista Del Mar, Playa Del Rey, CA, 90293** **Check in 4pm **Check out 10am"
SEVEN	07/03/2019	Communication on the Airbnb platform from defendant GOEL and others working with him to guest S.M.: "just tried calling you - what is the best number to reach you on."

COUNT	DATE	INTERSTATE WIRING	
EIGHT	07/09/2019	Communication on the Airbnb platform from defendant GOEL and others working with him to guest M.K.: "hey [M.] - what is the best number to reach you on? I'm having a bit of a plumbing problem so i wanted to reach out to you proactively!"	
NINE	07/14/2019	Communication on the Airbnb platform from Airbnb to guest S.B.: "I just want to let you know that [the host] can't promise that the toilet will be fixed today He mentioned that he already contacted a lot of plumbers but unfortunately no one responded. He wants to cancel the reservation"	
TEN	08/09/2019	Communication on the Airbnb platform from defendant GOEL and others working with him to guest E.N.: "You are located at: ** 20648 Pacific Coast Highway Malibu, CA 90265 ** **Check in 4pm **Check out 10am"	
ELEVEN	10/08/2019	Wires sent through the Airbnb platform associated with a reservation booked by J.Pon. for 20650 Pacific Coast Highway, Malibu, CA 90265, with host "Stephen F"	
TWELVE	10/12/2019	Communication on the Airbnb platform from defendant GOEL and others working with him to guest B.B.: "Trying to call you, what[']s the best number to reach you?"	
THIRTEEN	10/15/2019	Communication on the Airbnb platform from defendant GOEL and others working with him to guest J.Pon.: "[The refund] was sent" in response to the message: "I just spoke with Airbnb, they did not have the record of you requested to give me full refund. Please straighten out this issue immediately. It has been 3 days since I was supposed to stay at your property, in which my family was left stranded due to your plumbing issue."	

COUNTS FOURTEEN AND FIFTEEN

[18 U.S.C. \S \$ 1028A(a)(1), 2(b)]

5. The Grand Jury realleges paragraphs 1, 3, and 4 of this Indictment here.

6. On or about the dates set forth below, in Los Angeles County, within the Central District of California, and elsewhere, defendant GOEL knowingly transferred, possessed, and used, and willfully caused to be transferred, possessed, and used, without lawful authority, a means of identification that defendant GOEL knew belonged to another person, namely, the names of the individuals identified below by their initials, during and in relation to the offense of Wire Fraud, a felony violation of Title 18, United States Code, Section 1343, as charged in the counts of this Indictment identified below:

COUNT	DATES	MEANS OF IDENTIFICATION	PREDICATE FELONY VIOLATION
FOURTEEN	04/15/2019 to 05/08/2019	Name of A.S.	COUNT FOUR
FIFTEEN	06/19/2019 to 06/25/2019	Name of D.C.	COUNT FIVE

FORFEITURE ALLEGATION

[18 U.S.C. § 981(a)(1)(C); 28 U.S.C. § 2461(c)]

//

- 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), in the event of defendant SHRAY GOEL's conviction on the offenses set forth in any of Counts One through Fifteen of this Indictment.
- 2. Defendant GOEL, if so convicted, shall forfeit to the United States of America the following:
- a. All right, title, and interest in any and all property, real or personal, constituting, or derived from, any proceeds traceable to the offenses; and
- b. To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).
- 3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), defendant GOEL, if so convicted, shall forfeit substitute property, up to the total value of the property described in the preceding paragraph if, as the result of any act or omission of defendant GOEL, the property described in the preceding paragraph or any portion thereof (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has

Case 1:23-10 p. 0 4 5 10 2 3 3 10 p. 10 4 5 10 2 3 3 10 p. 10 4 5 10 2 3 10 p. 10 4 2 10 p. 10 p

been substantially diminished in value; or (e) has been commingled 1 2 with other property that cannot be divided without difficulty. 3 4 5 A TRUE BILL 6 7 /s/ Foreperson 8 9 E. MARTIN ESTRADA United States Attorney 10 11 12 MACK E. JENKINS Assistant United States Attorney 13 Chief, Criminal Division 14 RANEE A. KATZENSTEN Assistant United States Attorney 15 Chief, Major Frauds Section 16 SCOTT PAETTY Assistant United States Attorney 17 Deputy Chief, Major Frauds Section 18 KERRY L. QUINN 19 Assistant United States Attorney Major Frauds Section 20 2.1 22 23 24 25 26 27 28

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA MIAMI DIVISION

Case No. 23-MJ-4508-GOODMAN (SEALED)

UNITED STATES OF AMERICA,
Plaintiff,

V.

Shray Goel,	
•	Defendant(s).
	1

ORDER

THIS CAUSE came before the Court and pursuant to proceedings it is thereupon, PURSUANT TO THE ARREST OF THE ABOVE NAMED DEFENDANT, THIS CASE IS HEREBY UNSEALED.

DONE AND ORDERED at Miami, Florida.

Dated: 12/28/2023

Jonathan Goodman

UNITED STATES MAGISTRATE JUDGE

MINUTE ORDER

Page 3

Magistrate Judge Jonathan Goodman

King Building Courtroom 11-3	Date: 12/28/2023 Time: 1:30 p.m.	
Defendant: Shray Goel J#: 92985-510	Case #: 23-MJ-4508-GOODMAN	
	rney:	
Violation: C/D CA/Warr/Pet Wire Fraud/Aggravated Identity Theft	Surr/Arrest Date: 12/28/23 YOB: 1988	
Proceeding: Initial Appearance	CJA Appt:	
Bond/PTD Held: © Yes © No Recommended Bo	nd:	
Bond Set at: STIP-\$400,000 Personal Surety Bond	Co-signed by: Pankaj Goel and Nishtha Goel	
Surrender and/or do not obtain passports/travel docs	Language: English	
Report to PTS as directed/orx's a week/r	nonth by Disposition:	
phone:x's a week/month in person	Brady Order given. Motion to Unseal	
Random urine testing by Pretrial Services	the case GRANTED by the Court. AFPD	
Treatment as deemed necessary	assisted with the Bond paperwork.	
Refrain from excessive use of alcohol	Defendant has private counsel in the	
Participate in mental health assessment & treatment	Central District of California. All parties	
Maintain or seek full-time employment/education	STIPULATE to \$400K PSB co-signed by	
No contact with victims/witnesses, except through co	unsel Pankaj and Nishtha Goel. Defendant	
No firearms	Waived Removal and Identity hearing	
Not to encumber property	in open court. Court Ordered	
May not visit transportation establishments	Defendant removed to the Central	
Home Confinement/Electronic Monitoring and/or	District of California. All further	
Curfew pm to am, paid by	proceedings will be held in the Central	
Allowances: Medical needs, court appearances, attorn religious, employment	ney visits, District of California.	
Travel extended to:	Time from today to avaluded	
Other: See Attachment(s)	Time from today to excluded from Speedy Trial Clock	
NEXT COURT APPEARANCE Date: Time: J	udge: Place:	
Report RE Counsel:		
PTD/Bond Hearing:		
Prelim/Arraign or Removal:		
Status Conference RE:		
D.A.R. JG-13:31:17; 13:43:31	Time in Court: 22 mins.	
s/Jonathan Goodman	Magistrate Judge	

DEFENDANT: Shray Goel **CASE NUMBER:** 23-4508-MJ-GOODMAN

PAGE TWO

SPECIAL CONDITIONS OF BOND

In addition to compliance with the previously stated conditions of bond, the defendant must comply with the special conditions checked below:

DEFENDANT: Shray Goel
CASE NUMBER: 23-4508-MJ-GOODMAN
PAGE THREE

 s. Mandatory Adam Walsh Conditions: Defendant shall abide by specified restrictions on personal
associations, place of abode, or travel, to avoid all contact with an alleged victim of the crime and with a
potential witness who may testify concerning the offense; report on a regular basis to a designated law
enforcement agency, pretrial services agency or other agency; comply with a specified curfew (with electronic
monitoring) and refrain from possessing a firearm, destructive device or other dangerous weapons.

__ t. Additional Sex Offense Conditions For Defendants Charged or Convicted of a Sexual Offense:

- 1. () Defendant may not have contact with victim(s), or any child under the age of 18, unless approved by the Court or allowed by the U.S. Probation Officer.
- 2. () The defendant shall not possess or use any data encryption technique or program and shall provide passwords and administrative rights to the U.S. Probation Officer.
- 3. () Defendant shall participate in specialized sex offender evaluation and treatment, if necessary, and to contribute to the costs of services rendered based on ability to pay, as determined by the U.S. Probation Office.
- 4. () Defendant shall not possess, procure, purchase or otherwise obtain any internet capable device and/or computer. Additionally, the defendant is prohibited from using another individual's computer or device that has internet capability.
- 5. () Defendant is prohibited from establishing or maintaining any email account or social media account. Additionally, the defendant is prohibited from using another individual's email account or social media account. Must provide monthly or upon request, personal phone and credit card billings to Pretrial Services to confirm there are no services with any internet services provider.
- 6. () Defendant is not permitted to enter places where children congregate including, but not limited to any play areas, playgrounds, libraries, children-themed restaurants, daycares, schools, amusement parks, carnivals/fairs, unless approved by the U.S. Probation Officer.
- 7. () The defendant shall not be involved in any children's or youth organizations.
- 8. () Defendant is prohibited from viewing, owning, or possessing any obscene, pornographic, or sexually stimulating visual or auditory material, including telephone, electronic media, computer programs, or computer services.
- 9. () The defendant shall participate in a maintenance polygraph examination to periodically investigate the defendant's compliance. The polygraph examination shall specifically address only defendant's compliance or non-compliance with the special conditions of release and shall not inquire into the facts of the pending criminal case against defendant. The defendant will contribute to the costs of services rendered (co-payment) based on ability to pay or availability of third party payment.
- ✓ u. May travel to and from: <u>SD/FL to CD/ California</u>, and must notify Pretrial Services of travel plans before leaving and upon return. FOR HEARINGS ONLY.

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V	v. Comply with the following additional conditions of bond:
	Defendant's parents to sign over deed of their property in California (Address placed on the Court Record) by 1/26/24

DEFENDANT: CASE NUMBER: Shray Goel 23-4508-MJ-GOODMAN

PAGE FOUR

PENALTIES AND SANCTIONS APPLICABLE TO DEFENDANT

Violation of any of the foregoing conditions of release may result in the immediate issuance of a warrant for the defendant's arrest, a revocation of release, and order of detention, as provided in 18 U.S.C. §3148, forfeiture of any bail posted, and a prosecution for contempt as provided in 18 U.S.C. §401, which could result in a possible term of imprisonment or a fine.

The commission of any offense while on pretrial release may result in an additional sentence upon conviction for such offense to a term of imprisonment of not more than ten years, if the offense is a felony; or a term of imprisonment of not more than one year, if the offense is a misdemeanor. This sentence shall be consecutive to any other sentence and must be imposed in addition to the sentence received for the offense itself.

Title 18 U.S.C. §1503 makes it a felony criminal offense punishable by imprisonment and a \$250,000 fine to intimidate or attempt to intimidate a witness, juror or officer of the court; 18 U.S.C. §1510 makes it a felony criminal offense punishable by imprisonment and a \$250,000 fine to obstruct a criminal investigation; 18 U.S.C. §1512 makes it a felony criminal offense punishable by imprisonment and a \$250,000 fine to tamper with a witness, victim or informant; and 18 U.S.C. §1513 makes it a felony criminal offense punishable by imprisonment and a \$250,000 fine to retaliate against a witness, victim or informant, or threaten to do so.

It is a criminal offense under 18 U.S.C. §3146, if after having been released, the defendant knowingly fails to appear as required by the conditions of release, or to surrender for the service of sentence pursuant to a court order. If the defendant was released in connection with a charge of, or while awaiting sentence, surrender for the service of a sentence, or appeal or certiorari after conviction for:

- (1) an offense punishable by death, life imprisonment, or imprisonment for a term of fifteen years or more the defendant shall be fined not more than \$250,000 or imprisoned for not more than ten years, or both;
- (2) an offense punishable by imprisonment for a term of five years or more, but less than fifteen years, the defendant shall be fined not more than \$250,000 or imprisoned for not more than five years, or both;
- (3) any other felony, the defendant shall be fined not more than \$250,000 or imprisoned not more than two years, or both;
- (4) a misdemeanor, the defendant shall be fined not more than \$100,000 or imprisoned not more than one year, or both.

A term of imprisonment imposed for failure to appear or surrender shall be consecutive to the sentence of imprisonment for any other offense. In addition, a failure to appear may result in the forfeiture of any bail posted, which means that the defendant will be obligated to pay the full amount of the bond, which may be enforced by all applicable laws of the United States.

(Revised 03/2020)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

APPEARANCE BOND: \$400,000 PSB

CASE NO.: 23-4508-MJ-GOODMAN

	Plaintiff,	
v.		USM #: 92985-510
Shray Goel,		
-	Defendant,	
		ve, the undersigned sureties, jointly and severally acknowledge that we and d severally, are bound to pay the United States of America, the sum of

our personal representatives, jointly and severally, are bound to pay the United States of America, the sum of \$400,000 PSB

STANDARD CONDITIONS OF BOND

The conditions of this bond are that the defendant:

- 1. Shall appear before this Court and at such other places as the defendant may be required to appear, in accordance with any and all orders and directions relating to the defendant's appearance in this case, including appearance for violation of a condition of the defendant's release as may be ordered or notified by this Court or any other United States District Court to which the defendant may be held to answer or the cause transferred. The defendant is required to ascertain from the Clerk of Court or defense counsel the time and place of all scheduled proceedings on the case. In no event may a defendant assume that his or her case has been dismissed unless the Court has entered an order of dismissal. The defendant is to abide by any judgment entered in such matter by surrendering to serve any sentence imposed and obeying any order or direction in connection with such judgment. This is a continuing bond, including any proceeding on appeal or review, which shall remain in full force and effect until such time as the Court shall order otherwise.
- 2. May not travel outside the Southern District of Florida unless otherwise approved by the Court prior to any such travel. The Southern District of Florida consists of the following counties: Broward, Highlands, Indian River, Martin, Miami-Dade, Monroe, Okeechobee, Palm Beach and St. Lucie.
- 3. May not change his/her present address without prior notification and approval from the U.S. Probation Officer or the Court.
- 4. Must cooperate with law enforcement officers in the collection of a DNA sample if the collection is required by 42 U.S.C. Section 14135a.
- 5. Must not violate any federal, state or local law while on release in this case. Should the defendant come in contact with law enforcement he/she shall notify the U.S. Probation Officer within 72 hours.

DEFENDANT: Shray Goel **CASE NUMBER:** 23-4508-MJ-GOODMAN

PAGE TWO

SPECIAL CONDITIONS OF BOND

In addition to compliance with the previously stated conditions of bond, the defendant must comply with the special conditions checked below:

	during the pendency of the case; surrender on 12/29/2023 by 4pm.
	Report to Pretrial Services as follows: () as directed or time(s) a week in person and time(s) a week by telephone;
	Submit to substance abuse testing and/or treatment, contribute to the cost of services rendered based on ability to pay, as determined by the U.S. Probation Officer;
:	Refrain fromexcessive ORabstain from alcohol use or any use of a narcotic drug or other controlled substance, as defined in section 102 of the Controlled Substances Act (21 U.S.C. §802), without a prescription by a licensed medical practitioner;
	Participate in a mental health assessment and/or treatment and contribute to the costs of services rendered based on ability to pay, as determined by the U.S. Probation Officer;
\checkmark f. :	Employment restriction(s):may not work in an employment with access to PII of others including his current employment
✓ g. ?	Maintain or actively seek full-time employment; as permitted by Pretrial Services.
h.	Maintain or begin an educational program;
]	Avoid all contact with victims or witnesses to the crimes charged, except through counsel. The AUSA shall provide defense counsel and pretrial services with the names of all victims or witnesses. The prohibition against contact does not take effect until defense counsel receives the list. The prohibition against contact applies only to those persons on the list, but the prosecutor may expand the list by sending written notice to defense counsel and pretrial services.;
j.	Avoid all contact with co-defendants and defendants in related cases, except through counsel;
	Refrain from possessing a firearm, destructive device or other dangerous weapons and shall surrender (if any), their concealed weapons permit to the U.S. Probation Office;
	None of the signatories may sell, pledge, mortgage, hypothecate, encumber, etc., any real property they own, until the bond is discharged, or otherwise modified by the Court; Defendant and the Defendant's parents.
<u>✓</u> m.	May not visit commercial transportation establishment: airports, seaport/marinas, commercial bus terminals, train stations, etc.; Except for travelling to CD/CA for court purposes only.
n.	Defendant shall consent to the U.S. Probation Officer conducting periodic unannounced examinations of the defendant's computer equipment at his/her place of employment or on the computer at his/her residence which may include retrieval and copying of all data from the computer(s) and any internal or external peripherals to ensure compliance with this condition and/or removal of such equipment for the purpose of conducting a more thorough inspection; and consent at the direction of the U.S. Probation Officer to have installed on the defendant's computer(s), at the defendant's expense, any hardware or software systems to monitor the defendant's computer use;

_o. LOCATION MONITORING PROGRAM: The defendant shall be monitored by the form of location

DEFENDANT: DEFENDANT: Shray Goel
CASE NUMBER: 23-4508-MJ-GOODMAN

PAGE THREE

monitoring and shall abide by all technology requirements as noted below, as well as contribute to the costs of services rendered based on () ability to pay as determined by the U.S. Probation Officer - or - () paid by U.S. Probation: __Location monitoring technology at the discretion of the officer Radio Frequency (RF) monitoring (Electronic Monitoring) Active GPS Monitoring __ Voice Recognition Curfew: You are restricted to your residence every day from_____ to____, or as directed by the supervising officer. __Home Detention: You are restricted to your residence at all times except for: () medical () substance abuse or mental health treatment () court appearances () attorney visits or court ordered obligations () religious services () employment () other activities as pre-approved by the supervising officer — p. RESIDENTIAL RE-ENTRY CENTER: The defendant shall reside at a residential re-entry center or halfway house and abide by all the rules and regulations of the program. The cost to be paid by ()Pretrial Services or () based on the defendant's ability to pay. You are restricted to the residential re-entry center/halfway house at all times except for: () employment () education () religious services () medical, substance abuse, or mental health treatment () attorney visits () court appearances () court ordered obligations () reporting to Pretrial Services () other _____ will serve as a third party custodian and will ___ q. Third-Party Custody: report any violations of the release conditions to the U.S. Probation Officer. Failure to comply with these requirements, the third party custodian can be subject to the provisions of 18 U.S.C. § 401, Contempt of Court. r. The defendant shall submit his person, property, residence, vehicle, papers, computers, (as defined in 18 U.S.C. 1030(e)(1)), other electronic communication or data storage devices or media, or office, to a search conducted by a United States Probation Officer. The defendant must warn any other occupants that the premises may be subject to searches pursuant to this condition. Any search must be conducted at a reasonable time and in a reasonable manner.

DEFENDANT: Shray Goel
CASE NUMBER: 23-4508-MJ-GOODMAN
PAGE FOUR

s. Mandatory Adam Walsh Conditions: Defendant shall abide by specified restrictions on personal associations, place of abode, or travel, to avoid all contact with an alleged victim of the crime and with a potential witness who may testify concerning the offense; report on a regular basis to a designated law enforcement agency, pretrial services agency or other agency; comply with a specified curfew (with electronic monitoring) and refrain from possessing a firearm, destructive device or other dangerous weapons.
t. Additional Sex Offense Conditions For Defendants Charged or Convicted of a Sexual Offense:
 () Defendant may not have contact with victim(s), or any child under the age of 18, unless approved by the Court or allowed by the U.S. Probation Officer.
2. () The defendant shall not possess or use any data encryption technique or program and shall provide passwords and administrative rights to the U.S. Probation Officer.
3. () Defendant shall participate in specialized sex offender evaluation and treatment, if necessary, and to contribute to the costs of services rendered based on ability to pay, as determined by the U.S. Probation Office.
4. () Defendant shall not possess, procure, purchase or otherwise obtain any internet capable device and/or computer. Additionally, the defendant is prohibited from using another individual's computer or device that has internet capability.
5. () Defendant is prohibited from establishing or maintaining any email account or social media account. Additionally, the defendant is prohibited from using another individual's email account or social media account. Must provide monthly or upon request, personal phone and credit care billings to Pretrial Services to confirm there are no services with any internet services provider.
6. () Defendant is not permitted to enter places where children congregate including, but not limited to any play areas, playgrounds, libraries, children-themed restaurants, daycares, schools, amusement parks, carnivals/fairs, unless approved by the U.S. Probation Officer.
7. () The defendant shall not be involved in any children's or youth organizations.
8. () Defendant is prohibited from viewing, owning, or possessing any obscene, pornographic, or sexually stimulating visual or auditory material, including telephone, electronic media, computer programs, or computer services.
9. () The defendant shall participate in a maintenance polygraph examination to periodically investigate the defendant's compliance. The polygraph examination shall specifically address only defendant's compliance or non-compliance with the special conditions of release and shall not inquire into the facts of the pending criminal case against defendant. The defendant will contribute to the costs of services rendered (co-payment) based on ability to pay or availability of third party payment.
✓ u. May travel to and from: SD/FL to CD/ California, and must notify Pretrial Services of travel plans before leaving and upon return. FOR HEARINGS ONLY.
✓ v. Comply with the following additional conditions of bond: Defendant's parents to sign over deed of their property in California (Address placed on the Court Record) by 1/26/24. ———————————————————————————————————

DEFENDANT: CASE NUMBER:

Shray Goel 23-4508-MJ-GOODMAN

PAGE FIVE

PENALTIES AND SANCTIONS APPLICABLE TO DEFENDANT

Violation of any of the foregoing conditions of release may result in the immediate issuance of a warrant for the defendant's arrest, a revocation of release, and order of detention, as provided in 18 U.S.C. §3148, forfeiture of any bail posted, and a prosecution for contempt as provided in 18 U.S.C. §401, which could result in a possible term of imprisonment or a fine.

The commission of any offense while on pretrial release may result in an additional sentence upon conviction for such offense to a term of imprisonment of not more than ten years, if the offense is a felony; or a term of imprisonment of not more than one year, if the offense is a misdemeanor. This sentence shall be consecutive to any other sentence and must be imposed in addition to the sentence received for the offense itself.

Title 18 U.S.C. §1503 makes it a felony criminal offense punishable by imprisonment and a \$250,000 fine to intimidate or attempt to intimidate a witness, juror or officer of the court; 18 U.S.C. §1510 makes it a felony criminal offense punishable by imprisonment and a \$250,000 fine to obstruct a criminal investigation; 18 U.S.C. §1512 makes it a felony criminal offense punishable by imprisonment and a \$250,000 fine to tamper with a witness, victim or informant; and 18 U.S.C. §1513 makes it a felony criminal offense punishable by imprisonment and a \$250,000 fine to retaliate against a witness, victim or informant, or threaten to do so.

It is a criminal offense under 18 U.S.C. §3146, if after having been released, the defendant knowingly fails to appear as required by the conditions of release, or to surrender for the service of sentence pursuant to a court order. If the defendant was released in connection with a charge of, or while awaiting sentence, surrender for the service of a sentence, or appeal or certiorari after conviction for:

- (1) an offense punishable by death, life imprisonment, or imprisonment for a term of fifteen years or more the defendant shall be fined not more than \$250,000 or imprisoned for not more than ten years, or both;
- (2) an offense punishable by imprisonment for a term of five years or more, but less than fifteen years, the defendant shall be fined not more than \$250,000 or imprisoned for not more than five years, or both;
- (3) any other felony, the defendant shall be fined not more than \$250,000 or imprisoned not more than two years, or both;
- (4) a misdemeanor, the defendant shall be fined not more than \$100,000 or imprisoned not more than one year, or both.

A term of imprisonment imposed for failure to appear or surrender shall be consecutive to the sentence of imprisonment for any other offense. In addition, a failure to appear may result in the forfeiture of any bail posted, which means that the defendant will be obligated to pay the full amount of the bond, which may be enforced by all applicable laws of the United States.

DEFENDANT: Shray Goel
CASE NUMBER: 25-MJ-4508-Goodnan

PENALTIES AND SANCTIONS APPLICABLE TO SURETIES

Violation by the defendant of any of the foregoing conditions of release will result in an immediate obligation by the surety or sureties to pay the full amount of the bond. Forfeiture of the bond for any breach of one or more conditions may be declared by a judicial officer of any United States District Court having cognizance of the above entitled matter at the time of such breach, and if the bond is forfeited and the forfeiture is not set aside or remitted, judgment may be entered upon motion in such United States District Court against each surety jointly and severally for the amount of the bond, together with interest and costs, and execution may be issued and payment secured as provided by the Federal Rules of Criminal Procedure and other laws of the United States.

SIGNATURES

I have carefully read and I understand this entire appearance bond consisting of seven pages, or it has been read to me, and, if necessary, translated into my native language, and I know that I am obligated by law to comply with all of the terms of this bond. I promise to obey all conditions of this bond, to appear in court as required, and to surrender for service of any sentence imposed. I am aware of the penalties and sanctions outlined in this bond for violations of the terms of the bond.

If I am an agent acting for or on behalf of a corporate surety, I further represent that I am a duly authorized agent for the corporate surety and have full power to execute this bond in the amount stated.

<i>D. T. T. T. T. T. T. T. T</i>	**
	<u>ENDANT</u>
Signed this 28 day of December, 2023	at Miani, Florida
Signed and acknowledged before me:	EFENDANT: (Signature)
WITNESS:	Mani FC
mani #	City State
City State	
CORPOR	ATE SURETY
Signed this day of , 20	
	AGENT: (Signature)
	PRINT NAME:
City State	FRINI NAME:
	LOS AMP & C
Signed this 2 3day of DE Emiz 2023 at MGE Florida	Signed this 28 day of december 120 23 at A Florida 500
SURETY: (Signature)	SURETY: (Signature) Millio 10 CALIFOO
PRINT NAME: PANKAT GOE	PRINT NAME: MISHTHA GUEL
RELATIONSHIP TO DEFENDANT: FATHER	RELATIONSHIP TO DEFENDANT: MYCHER
LOS ANGELES CALIFORNIA	LOS ANGELER CALIFORNIA
City State	City State
Signed this 20 day of December, 20 73 stor AND Florida	ANA Signed thisday of, 20at, Florida
SURETY: (Signature)	SURETY: (Signature)
PRINT NAME:	PRINT NAME:
RELATIONSHIP TO DEFENDANT:	RELATIONSHIP TO DEFENDANT:
	Charles
City State	City
<u> </u>	BY THE COURT
Date: Vec 28 2023	
	XINFFED STATES MAGISTRATE JUDGE
	MNIATHAN COODMAN

(Revised 03/2020)

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

APPEARANCE BOND: <u>\$400,000 PSB</u>

CASE NO.: 23-4508-MJ-GOODMAN

UNITED STATES	OF AMERICA:		
	Plaintiff,		
v.		USM #: 92985-510	
Shray Goel,			
	Defendant,		
		/	
		re, the undersigned sureties, jointly and severally acknown is severally, are bound to pay the United States of Americ	

STANDARD CONDITIONS OF BOND

The conditions of this bond are that the defendant:

- 1. Shall appear before this Court and at such other places as the defendant may be required to appear, in accordance with any and all orders and directions relating to the defendant's appearance in this case, including appearance for violation of a condition of the defendant's release as may be ordered or notified by this Court or any other United States District Court to which the defendant may be held to answer or the cause transferred. The defendant is required to ascertain from the Clerk of Court or defense counsel the time and place of all scheduled proceedings on the case. In no event may a defendant assume that his or her case has been dismissed unless the Court has entered an order of dismissal. The defendant is to abide by any judgment entered in such matter by surrendering to serve any sentence imposed and obeying any order or direction in connection with such judgment. This is a continuing bond, including any proceeding on appeal or review, which shall remain in full force and effect until such time as the Court shall order otherwise.
- 2. May not travel outside the Southern District of Florida unless otherwise approved by the Court prior to any such travel. The Southern District of Florida consists of the following counties: Broward, Highlands, Indian River, Martin, Miami-Dade, Monroe, Okeechobee, Palm Beach and St. Lucie.
- 3. May not change his/her present address without prior notification and approval from the U.S. Probation Officer or the Court.
- 4. Must cooperate with law enforcement officers in the collection of a DNA sample if the collection is required by 42 U.S.C. Section 14135a.
- 5. Must not violate any federal, state or local law while on release in this case. Should the defendant come in contact with law enforcement he/she shall notify the U.S. Probation Officer within 72 hours.

DEFENDANT: Shray Goel **CASE NUMBER:** 23-4508-MJ-GOODMAN

PAGE TWO

SPECIAL CONDITIONS OF BOND

In addition to compliance with the previously stated conditions of bond, the defendant must comply with the special conditions checked below:

	during the pendency of the case; surrender on 12/29/2023 by 4pm.
	Report to Pretrial Services as follows: () as directed or time(s) a week in person and time(s) a week by telephone;
	Submit to substance abuse testing and/or treatment, contribute to the cost of services rendered based on ability to pay, as determined by the U.S. Probation Officer;
:	Refrain fromexcessive ORabstain from alcohol use or any use of a narcotic drug or other controlled substance, as defined in section 102 of the Controlled Substances Act (21 U.S.C. §802), without a prescription by a licensed medical practitioner;
	Participate in a mental health assessment and/or treatment and contribute to the costs of services rendered based on ability to pay, as determined by the U.S. Probation Officer;
\checkmark f. :	Employment restriction(s):may not work in an employment with access to PII of others including his current employment
✓ g. ?	Maintain or actively seek full-time employment; as permitted by Pretrial Services.
h.	Maintain or begin an educational program;
]	Avoid all contact with victims or witnesses to the crimes charged, except through counsel. The AUSA shall provide defense counsel and pretrial services with the names of all victims or witnesses. The prohibition against contact does not take effect until defense counsel receives the list. The prohibition against contact applies only to those persons on the list, but the prosecutor may expand the list by sending written notice to defense counsel and pretrial services.;
j.	Avoid all contact with co-defendants and defendants in related cases, except through counsel;
	Refrain from possessing a firearm, destructive device or other dangerous weapons and shall surrender (if any), their concealed weapons permit to the U.S. Probation Office;
	None of the signatories may sell, pledge, mortgage, hypothecate, encumber, etc., any real property they own, until the bond is discharged, or otherwise modified by the Court; Defendant and the Defendant's parents.
<u>✓</u> m.	May not visit commercial transportation establishment: airports, seaport/marinas, commercial bus terminals, train stations, etc.; Except for travelling to CD/CA for court purposes only.
n.	Defendant shall consent to the U.S. Probation Officer conducting periodic unannounced examinations of the defendant's computer equipment at his/her place of employment or on the computer at his/her residence which may include retrieval and copying of all data from the computer(s) and any internal or external peripherals to ensure compliance with this condition and/or removal of such equipment for the purpose of conducting a more thorough inspection; and consent at the direction of the U.S. Probation Officer to have installed on the defendant's computer(s), at the defendant's expense, any hardware or software systems to monitor the defendant's computer use;

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DEFENDANT:

Shray Goel

CASE NUMBER: 23-4508-MJ-GOODMAN PAGE THREE

_o. LOCATION MONITORING PROGRAM: The defendant shall be monitored by the form of location monitoring and shall abide by all technology requirements as noted below, as well as contribute to the costs of services rendered based on () ability to pay as determined by the U.S. Probation Officer - or - () paid by U.S. Probation: __Location monitoring technology at the discretion of the officer __Radio Frequency (RF) monitoring (Electronic Monitoring) __ Active GPS Monitoring __ Voice Recognition Curfew: You are restricted to your residence every day from_____ to____, or as directed by the supervising officer. __Home Detention: You are restricted to your residence at all times except for: () medical () substance abuse or mental health treatment () court appearances () attorney visits or court ordered obligations () religious services () employment () other activities as pre-approved by the supervising officer — p. RESIDENTIAL RE-ENTRY CENTER: The defendant shall reside at a residential re-entry center or halfway house and abide by all the rules and regulations of the program. The cost to be paid by ()Pretrial Services or () based on the defendant's ability to pay. You are restricted to the residential re-entry center/halfway house at all times except for: () employment () education () religious services () medical, substance abuse, or mental health treatment () attorney visits () court appearances () court ordered obligations () reporting to Pretrial Services () other _____ will serve as a third party custodian and will ___ q. Third-Party Custody: report any violations of the release conditions to the U.S. Probation Officer. Failure to comply with these requirements, the third party custodian can be subject to the provisions of 18 U.S.C. § 401, Contempt of Court. r. The defendant shall submit his person, property, residence, vehicle, papers, computers, (as defined in 18 U.S.C. 1030(e)(1)), other electronic communication or data storage devices or media, or office, to a search conducted by a United States Probation Officer. The defendant must warn any other occupants that the premises may be subject to searches pursuant to this condition. Any search must be conducted at a reasonable time and in a reasonable manner.

DEFENDANT: Shray Goel
CASE NUMBER: 23-4508-MJ-GOODMAN
PAGE FOUR

associations, place of abode, or travel, to avoid all contact with an alleged victim of the crime and with a potential witness who may testify concerning the offense; report on a regular basis to a designated law enforcement agency, pretrial services agency or other agency; comply with a specified curfew (with electronic monitoring) and refrain from possessing a firearm, destructive device or other dangerous weapons.
t. Additional Sex Offense Conditions For Defendants Charged or Convicted of a Sexual Offense:
1. () Defendant may not have contact with victim(s), or any child under the age of 18, unless approved by the Court or allowed by the U.S. Probation Officer.
2. () The defendant shall not possess or use any data encryption technique or program and shall provide passwords and administrative rights to the U.S. Probation Officer.
3. () Defendant shall participate in specialized sex offender evaluation and treatment, if necessary, and to contribute to the costs of services rendered based on ability to pay, as determined by the U.S. Probation Office.
4. () Defendant shall not possess, procure, purchase or otherwise obtain any internet capable device and/or computer. Additionally, the defendant is prohibited from using another individual's computer or device that has internet capability.
5. () Defendant is prohibited from establishing or maintaining any email account or social media account. Additionally, the defendant is prohibited from using another individual's email account or social media account. Must provide monthly or upon request, personal phone and credit care billings to Pretrial Services to confirm there are no services with any internet services provider
6. () Defendant is not permitted to enter places where children congregate including, but not limited to any play areas, playgrounds, libraries, children-themed restaurants, daycares, schools, amusement parks, carnivals/fairs, unless approved by the U.S. Probation Officer.
7. () The defendant shall not be involved in any children's or youth organizations.
8. () Defendant is prohibited from viewing, owning, or possessing any obscene, pornographic, or sexually stimulating visual or auditory material, including telephone, electronic media, computer programs, or computer services.
9. () The defendant shall participate in a maintenance polygraph examination to periodically investigate the defendant's compliance. The polygraph examination shall specifically address only defendant's compliance or non-compliance with the special conditions of release and shal not inquire into the facts of the pending criminal case against defendant. The defendant will contribute to the costs of services rendered (co-payment) based on ability to pay or availability of third party payment.
✓ u. May travel to and from: SD/FL to CD/ California, and must notify Pretrial Services of travel plans befor leaving and upon return. FOR HEARINGS ONLY.
✓ v. Comply with the following additional conditions of bond: Defendant's parents to sign over deed of their property in California (Address placed on the Court Record) by 1/26/24 ———————————————————————————————————

DEFENDANT: CASE NUMBER:

Shray Goel 23-4508-MJ-GOODMAN

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PENALTIES AND SANCTIONS APPLICABLE TO DEFENDANT

Violation of any of the foregoing conditions of release may result in the immediate issuance of a warrant for the defendant's arrest, a revocation of release, and order of detention, as provided in 18 U.S.C. §3148, forfeiture of any bail posted, and a prosecution for contempt as provided in 18 U.S.C. §401, which could result in a possible term of imprisonment or a fine.

The commission of any offense while on pretrial release may result in an additional sentence upon conviction for such offense to a term of imprisonment of not more than ten years, if the offense is a felony; or a term of imprisonment of not more than one year, if the offense is a misdemeanor. This sentence shall be consecutive to any other sentence and must be imposed in addition to the sentence received for the offense itself.

Title 18 U.S.C. §1503 makes it a felony criminal offense punishable by imprisonment and a \$250,000 fine to intimidate or attempt to intimidate a witness, juror or officer of the court; 18 U.S.C. §1510 makes it a felony criminal offense punishable by imprisonment and a \$250,000 fine to obstruct a criminal investigation; 18 U.S.C. §1512 makes it a felony criminal offense punishable by imprisonment and a \$250,000 fine to tamper with a witness, victim or informant; and 18 U.S.C. §1513 makes it a felony criminal offense punishable by imprisonment and a \$250,000 fine to retaliate against a witness, victim or informant, or threaten to do so.

It is a criminal offense under 18 U.S.C. §3146, if after having been released, the defendant knowingly fails to appear as required by the conditions of release, or to surrender for the service of sentence pursuant to a court order. If the defendant was released in connection with a charge of, or while awaiting sentence, surrender for the service of a sentence, or appeal or certiorari after conviction for:

- (1) an offense punishable by death, life imprisonment, or imprisonment for a term of fifteen years or more the defendant shall be fined not more than \$250,000 or imprisoned for not more than ten years, or both;
- (2) an offense punishable by imprisonment for a term of five years or more, but less than fifteen years, the defendant shall be fined not more than \$250,000 or imprisoned for not more than five years, or both;
- (3) any other felony, the defendant shall be fined not more than \$250,000 or imprisoned not more than two years, or both;
- (4) a misdemeanor, the defendant shall be fined not more than \$100,000 or imprisoned not more than one year, or both.

A term of imprisonment imposed for failure to appear or surrender shall be consecutive to the sentence of imprisonment for any other offense. In addition, a failure to appear may result in the forfeiture of any bail posted, which means that the defendant will be obligated to pay the full amount of the bond, which may be enforced by all applicable laws of the United States.

DEFENDANT: Shray Goel CASE NUMBER: 25-MJ-4508-Goodman

PAGE SIX

PENALTIES AND SANCTIONS APPLICABLE TO SURETIES

Violation by the defendant of any of the foregoing conditions of release will result in an immediate obligation by the surety or sureties to pay the full amount of the bond. Forfeiture of the bond for any breach of one or more conditions may be declared by a judicial officer of any United States District Court having cognizance of the above entitled matter at the time of such breach, and if the bond is forfeited and the forfeiture is not set aside or remitted, judgment may be entered upon motion in such United States District Court against each surety jointly and severally for the amount of the bond, together with interest and costs, and execution may be issued and payment secured as provided by the Federal Rules of Criminal Procedure and other laws of the United States.

SIGNATURES

I have carefully read and I understand this entire appearance bond consisting of seven pages, or it has been read to me, and, if necessary, translated into my native language, and I know that I am obligated by law to comply with all of the terms of this bond. I promise to obey all conditions of this bond, to appear in court as required, and to surrender for service of any sentence imposed. I am aware of the penalties and sanctions outlined in this bond for violations of the terms of the bond.

If I am an agent acting for or on behalf of a corporate surety, I further represent that I am a duly authorized agent for the corporate surety and have full power to execute this bond in the amount stated.

DEFEN	DANT
Signed this 28 day of December, 2023 at	M) ani, Florida
Signed and acknowledged before me: DEFI	ENDANT: (Signature)
WITNESS:	Mani FC
mani FC	City State
City • State	
CORPORAT	E SURETY
Signed this day of, 20at	, Florida
SURETY:AG	ENT: (Signature)
	INT NAME:
City State	
LOS INDIVIDUAL	
Signed this 2 8day of DECEMB 2023 at MCELE Plorida	Signed this 28 day of december 2023 at 1 Horida
SURETY: (Signature)	SURETY: (Signature) Millio (10)
	PRINT NAME: MISHTHA GUEL
	RELATIONSHIP TO DEFENDANT: MYSTHER
	OS/AUGENET CALIFORNIA
City State	City State
Signed this 20 day of December, 20 23 at her AND Florida	Signed thisday of, 20at, Florida
SURETY: (Signature)	SURETY: (Signature)
	PRINT NAME:
RELATIONSHIP TO DEFENDANT:	RELATIONSHIP TO DEFENDANT:
City State	City / State
•	Y THE COURT
0 22 2 2 2 7	
Date: Vec 28 CO 25	XNATED STATES MAGISTRATE JUDGE
	JUNATHAN GUUDIVIAN

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CM/ECF RESTRICTED

DEFENDANT: Shray Goel
CASE NUMBER: 23- mJ-4508 Goodman
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PENALTIES AND SANCTIONS APPLICABLE TO SURETIES

Violation by the defendant of any of the foregoing conditions of release will result in an immediate obligation by the surety or sureties to pay the full amount of the bond. Forfeiture of the bond for any breach of one or more conditions may be declared by a judicial officer of any United States District Court having cognizance of the above entitled matter at the time of such breach, and if the bond is forfeited and the forfeiture is not set aside or remitted, judgment may be entered upon motion in such United States District Court against each surety jointly and severally for the amount of the bond, together with interest and costs, and execution may be issued and payment secured as provided by the Federal Rules of Criminal Procedure and other laws of the United States.

SIGNATURES

I have carefully read and I understand this entire appearance bond consisting of seven pages, or it has been read to me, and, if necessary, translated into my native language, and I know that I am obligated by law to comply with all of the terms of this bond. I promise to obey all conditions of this bond, to appear in court as required, and to surrender for service of any sentence imposed. I am aware of the penalties and sanctions outlined in this bond for violations of the terms of the bond.

If I am an agent acting for or on behalf of a corporate surety, I further represent that I am a duly authorized agent for the corporate surety and have full power to execute this bond in the amount stated.

<u>]</u>	<u>DEFENDANT</u>
Signed this 28 day of December, 202	3 at Mana, Florida
Signed and acknowledged before me:	
WITNESS: Bunni Lonal	ADDRESS: 1600 N.E. Ist tve
ADDRESS: 150. LD. Flagger St	miami FC ZIP: 33132
Mianic FC ZIP: 33130	TELEPHONE:
	PORATE SURETY
Signed this, 20,	
SURETY:	
ADDRESS:	PRINT NAME:
Z1P:	TELEPHONE:
Signed this 2 sday of Decembe, 2022 at CA, Flow SURETY: (Signature) PRINT NAME: PARA T SOE RELATIONSHIP TO DEFENDANT: FATTISP ADDRESS: 26748 PRINT CA ZIP: C11300 TELEPHONE:	IDUAL SURETIES FIG. Signed this 28 day of DECEMPD, 2023at Florida CA SURETY: (Signature) PRINT NAME: NOTTHER ADDRESS: 26749 PROFE CE DO. TELEPHONE:
Signed thisday of, 20 at, Flow SURETY: (Signature)	rida Signed thisday of, 20at, Florida SURETY: (Signature) PRINT NAME: RELATIONSHIP TO DEPENDANT: ADDRESS:
TELEPHONE:	TELEPHONE:
IELETIVNE:	i Clef Nune.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

Case No: 23-MJ-4508-GOODMAN

United States Plaint						
v.	Charg	ging District's Case No. 2:23CR623-WLH				
Shray Goel,						
Defen	ndant.					
	/					
	WAIVER OF RULE 5 & 5.1 RI	EMOVAL/IDENTITY HEARINGS				
I unde	erstand that I have been charged in an	other district, the Central District of California.				
I have	e been informed of the charges and of	my rights to:				
(1) (2) (3)	an identity hearing to determine wh production of the warrant, a certific either;	ment of counsel if I am unable to retain counsel; ether I am the person named in the charges; ed copy of the warrant, or a reliable electronic copy of				
(4)	a preliminary hearing within 14 days of my first appearance if I am in custody and 21 days otherwise — unless I am indicted — to determine whether there is probable cause to believe that an offense has been committed;					
(5) (6)	a hearing on any motion by the government for detention; request transfer of the proceedings to this district under Fed. R. Crim. P. 20, to plead guilty.					
I agre	ee to waive my rights to: (check those	that apply)				
	An identity hearing and production	of the warrant.				
	A preliminary hearing.					
	A detention hearing in the Southern	District of Florida.				
	An identity hearing, production of	the warrant, and any preliminary or detention hearing				
	to which I may be entitled to in thi	is district. I request that those hearings be held in the				
	prosecuting district, at a time set by	that court.				
I cons	sent to the issuance of an order requi	iring my appearance in the prosecuting district where				
the charges a	are pending against me.					
Date: 12/28/	/2023	Defendant's Signature Jonathan Goodman				
		United States Magistrate Judge				

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

Case No. 23-MJ-4508-GOODMAN

United States	of America Plaintiff,			
v.				
Shray Goel,	Defendent			
	Defendant.			
		/		

ORDER OF REMOVAL

It appearing that in the Central District of California, an Indictment was filed against the above-named defendant on a charge of Wire Fraud/Aggravated Identity Theft, and that the defendant was arrested in the Southern District of Florida and was given a hearing before United States Magistrate Judge Jonathan Goodman at Miami, Florida, which officially committed the defendant for removal to the Central District of California, it is ORDERED AND ADJUDGED that the defendant be removed to the above-named district for trial on said charge.

DONE AND ORDERED at Miami, Florida on 12/28/2023.

onathan Goodman

United States Magistrate Judge